

1 LUIS A. CARRILLO, Esq. SBN 70398  
2 MICHAEL S. CARRILLO, Esq. SBN 258878  
3 LAURA M. JIMENEZ, Esq. SBN 237273  
4 **CARRILLO LAW FIRM, LLP**  
5 1499 Huntington Drive, Suite 402  
South Pasadena, CA 91030  
Tel: (626) 799-9375/ Fax: (626) 799-9380

6 Attorneys for Plaintiffs

7 **UNITED STATES DISTRICT COURT**  
8 **CENTRAL DISTRICT OF CALIFORNIA**

9 **KIMBERLY LAMB and LELAND**  
10 **RICHARD BARNETT,**

11 Plaintiffs,

12 v.

13 **COUNTY OF LOS ANGELES AND**  
14 **DOES 1 THROUGH 20, INCLUSIVE,**

15 Defendants.

} Case No.: 2:23-cv-03479-JLS-MAA  
Hon. Josephine L. Staton

} **JOINT NOTICE OF CONDITIONAL**  
**SETTLEMENT AND REQUEST TO**  
**VACATE DATES**

16  
17 **TO THE HONORABLE COURT:**

18 Plaintiffs KIMBERLY LAMB and LELAND RICHARD BARNETT, (“Plaintiffs”)  
19 and Defendant COUNTY OF LOS ANGELES (“Defendant”), hereby inform the Court of  
20 their conditional settlement of this entire matter, and respectfully request that the Court  
21 vacate all dates in this matter, as follows:

- 22 1. On May 28, 2024, the Plaintiffs and Defendants attended mediation with Richard  
23 T. Copeland.

2. On May 30, 2024, all parties agreed and stipulated to settle this matter and discharge all of the Plaintiffs' claims against all Defendants in this case. The conditional settlement is subject to approval by the Los Angeles County Claims Board and Board of Supervisors

3. The parties anticipate that, after preparation of the necessary paperwork, the Los Angeles County Board of Supervisors will consider the settlement and that the approval process will take approximately upwards of 12 months. Once Plaintiffs receive the settlement proceeds, the parties will file a stipulated dismissal of all of Plaintiffs' claims against all Defendants;

4. Currently, the Final Pretrial Conference is set November 22, 2024;

5. Accordingly, based on the above and for good cause, the parties respectfully request that the Court vacate all of the existing dates; and

6. The parties further request that the Court schedule a Status Conference re: Settlement in February 2025. Assuming the Los Angeles County Board of Supervisors approves the settlement, the parties anticipate that they can complete all of the terms of the settlement and file a Stipulation for Dismissal, with prejudice, prior to the date so that the Status Conference would be taken off calendar.

Respectfully submitted,

DATED: June 6, 2024

**CARRILLO LAW FIRM**

By: /s/ Laura M. Jimenez  
Laura M. Jimenez, Esq.  
Attorneys for Plaintiffs

1  
2 **DATED: June 6, 2024**

3  
4 **COLLINSON, DAEHNKE, INLOW &**  
**GRECO**

5  
6 By: /s/*Lenore C. Kelly*

7 Lenore C. Kelly, Esq.

8 Attorney for Defendants

9 COUNTY OF LOS ANGELES

10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25